

REMARKS

Original claims 1-35 have not been amended in lieu of the arguments below.

DRAWINGS

The Examiner has requested that Figures 6 and 7 be relabeled as Figures 6a and 6b, and 7a and 7b, respectively. It is respectfully submitted that the current labeling is correct. As explained in paragraph 30 of the specification, Figures 6 and 7 are perspective views of cut-off sections of mast 10. Because mast 10 has two arms 12 and 14, there are what appear to be two figures where, in fact, they are two different arm portions within the same view. To make this clearer, Applicants propose correcting the Figures 6 and 7 by adding a bracket and the reference number 10 to each of them, as indicated in red on the enclosed sheets.

Paragraph 39 of the specification has been amended to correct the informalities objected to in paragraph 2 of the Office action. Specifically, the cage or frame of coiled tubing injector 78 is consistently referenced by the number "84," and the reference to the goose-neck support assembly is now consistently the number "86."

Submitted with this response is a proposed correction to Figure 10A that changes reference number "72" to reference number "68" for consistency with the specification.

SPECIFICATION

The amendments to the specification made above are in response to the objections to the drawings and specification made by the Examiner. It is submitted the amendments to paragraph 38 cures the objection raised in paragraph 4 of the Detailed Action.

AMENDMENTS TO THE CLAIMS

The amendments to the claims correct informalities and typographical errors objected to or noted by the examiner. They do not narrow the scope of any of the claims, and are not being made in response to any rejection. Specifically, the amendment to claims 4 and 10 delete an extraneous "a"; the amendments to claims 5 and 6 change "a degree" to "the degree," per the preference of the examiner; the amendment of claim 8 simply inserts a missing space; the amendment to claim 30 substitutes "vehicle" for "support platform" to provide correct antecedent

basis; and the amendments to claims 31-35 substitute "vehicle" for "apparatus" for conformance with claim 29, per the request of the examiner.

REJECTION OF CLAIMS 1-3, 5-9, 11-18, and 20-35 under 35 U.S.C. 103(a)

Applicants respectfully traverse this rejection. The rejection of each of these claims is premised on an erroneous reading of Sizer et al. Elements 111 and 112 in Sizer et al., which the examiner describes as "arms," are described by Sizer et al. as telescoping "guide tubes." They explain in column 2, at lines 42-43, that the guide tubes are non-load bearing and do not function to lift. Rather, load bearing mast 110 serves that purpose. See, *id.*

Each of the rejected claims contemplates lifting oilfield apparatus through simultaneous extension of two or more telescoping arms. Neither Sizer et al. or McCafferty et al. teach or suggest this.

Therefore, the combination of Sizer et al. with McCafferty et al. falls short of meeting all of the elements of each of the rejected claims, and the motivation and reasoning in support for the combination of these two references, as well as the combination of these references with the other cited references, rests on a faulty premise. Because this combination forms the basis of the rejection of each of these claims, the rejection of each of these claims is in error. Applicants request that this rejection be withdrawn.

In view of the foregoing error, other errors in the reasoning underlying the rejections of claims 1-3, 5-9, 11-18, and 20-35 under 35 U.S.C. 103(a) have not been addressed. Applicants do not waive their right to respond to these errors.

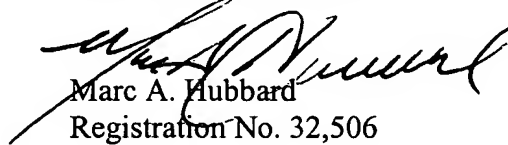
ALLOWED CLAIMS

Applicants note with appreciation the examiner's willingness to allow claims 4, 10 and 19 if they are placed in independent form. However, in view of the foregoing remarks, applicants have not placed these claims in independent form.

CONCLUSION

It is submitted that the application is in condition to be allowed, and such action is respectfully requested. The Commissioner is hereby authorized to charge any fees or credit any overpayments associated with this communication to Deposit Account No. 13-4900 of Munsch Hardt Kopf & Harr, P.C.

Respectfully submitted,


Marc A. Hubbard
Registration No. 32,506

Date: 20 July 2004
Munsch Hardt Kopf & Harr, P.C.
4000 Fountain Place
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-855-7571
Facsimile: 214-855-7584

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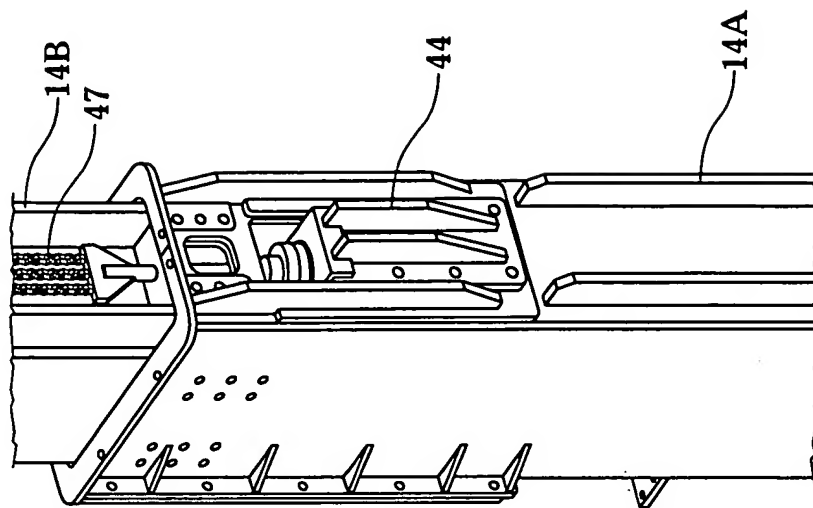
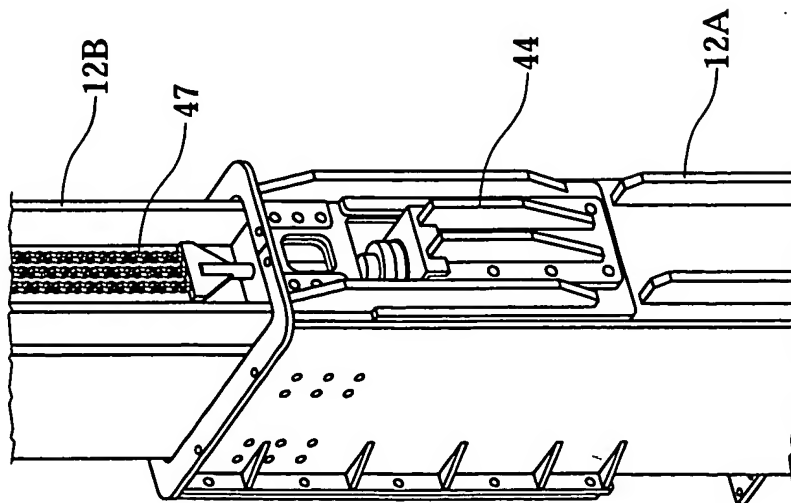


Fig. 6



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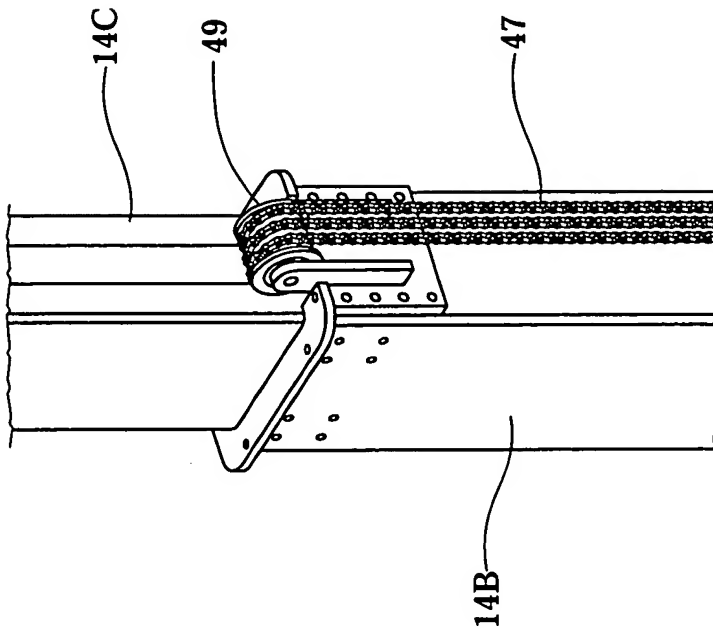
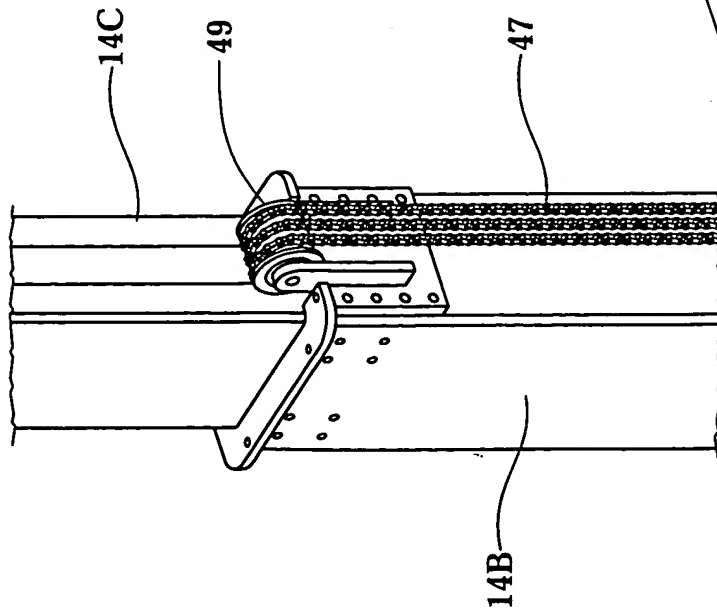


Fig. 7

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